

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC.,
and TRUE THE VOTE,

Plaintiffs,

v.

J. BRADLEY KING, *et al.*

Defendants.

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Case No. 1:12-cv-800-WTL-TAB

PLAINTIFFS' FINAL WITNESS AND EXHIBIT LIST

Plaintiffs Judicial Watch and True the Vote, by counsel, hereby provide to the Court and to the Defendants a list of the witnesses and exhibits Plaintiffs plan to introduce at trial.

Plaintiffs may not call all of the witnesses on this list, and Plaintiffs reserve the right to supplement this list in response to new discovery provided by Defendants. Witness addresses and telephone numbers reasonably available to Plaintiffs were provided in Plaintiffs' initial disclosures, or are otherwise supplied.

Witnesses

1. J. Bradley King, Co-Director, Indiana Election Division
2. Trent Deckard, Co-Director, Indiana Election Division
3. Sarah Redman, Clerk of the Circuit Court, Warrick County Indiana
4. Terrence Coleman, Voter Registration Board Member, St. Joseph County Indiana
5. Francisco Fotia, Voter Registration Board Member, St. Joseph County Indiana
6. Tom Fitton, President, Judicial Watch, Inc.
7. Catherine Engelbrecht, President, True the Vote

8. Steven Camarota, Ph.D., 1629 K Street NW, Suite 600, Washington, DC 20006, (202) 466-8185
9. Karen Handel, President, Handel Strategy Group, 3085 Roxburgh Drive, Roswell, GA 30076, (404) 482-2460
10. Any Defendant witness or expert(s) Defendants may retain and designate to testify

Exhibits

1. Report of Karen Handel, Plaintiffs' Expert Witness
2. Exhibits 3 through 9 to Deposition Transcript of Trent Deckard, Election Division Co-Director:
 - i. Interstate Voter Registration Crosscheck Program, 2013 (excerpts)
 - ii. NASS Report: Maintenance of State Voter Registration Lists, 2009 (excerpts)
 - iii. July 22, 2009 Memo from Pamela Potesta to Vote Indiana Team Members
 - iv. 2012 Indiana Voter Registration Guidebook (excerpts)
 - v. 2012 Election Administrator's Manual (excerpts)
 - vi. Indiana SVRS Standard Operating Procedures (excerpts)
 - vii. February 29, 2008 Written Plan for Compliance with Consent Decree
3. Exhibits 1 and 2 to Deposition Transcript of Sarah Redman, Warrick County Circuit Court Clerk:
 - i. Indiana SVRS Best Practices Guidebook (excerpts)
 - ii. February 27, 2013 Memo to Counties from Indiana Secretary of State
4. 2011 U.S. Election Assistance Commission Report to Congress for 2008-2010 (excerpts)
5. Indiana County 2010 Census Data and Voter Registration Analysis prepared by Steven Camarota (PL-00089 to PL-00092)

6. Indiana Election Division Co-Directors First Interrogatory Responses (excerpts)
7. Indiana Election Division Co-Directors Second Interrogatory Responses (excerpts)
8. Judicial Watch member correspondence re NVRA litigation (PL-00013 to PL-00019)
9. Judicial Watch membership survey results re election integrity (PL-00020)
10. True the Vote analysis of Indiana voter rolls (PL-00093 to PL-00095)
11. True the Vote guide for Indiana election monitors (PL-00035 to PL-00088)
12. Indiana Election Division March 9, 2012 ruling re NVRA claims and notice of violation
13. Documents relied upon by any expert(s) Defendants may retain and designate to testify

Dated: September 12, 2013

Respectfully submitted,

David R. Langdon
Joshua B. Bolinger

LANGDON LAW LLC
8913 Cincinnati-Dayton Rd.
West Chester, Ohio 45069
Tel: (513) 577-7380
Fax: (513) 577-7383
Email: dlangdon@langdonlaw.com
jbolinger@langdonlaw.com

J. Christian Adams
Of Counsel

ELECTION LAW CENTER, PLLC
300 N. Washington Street, Ste. 405
Alexandria, VA 22314

/s/ Chris Fedeli
Paul J. Orfanedes
Chris Fedeli
Admitted *Pro Hac Vice*

JUDICIAL WATCH, INC.
425 Third Street S.W., Ste. 800
Washington, DC 20024
Tel: (202) 646-5172
Fax: (202) 646-5199
Email: porfanedes@judicialwatch.org
cfedeli@judicialwatch.org

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli
Chris Fedeli